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August 12, 2005

Arthur Neal
Director
Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW.
Room 4008—So
Ag Stop 0268
Washington, DC 20250

National.List@usda.gov

**RE: Docket No. TM-05-02
National Organic Program, Proposed Amendment to the National List of Allowed
and Prohibited Substances (Livestock)
Sections 205.603—Methionine**

Dear Mr. Neal,

We are writing to support the allowance of DL-Methionine, per the proposed amendment to Section 205.603, paragraph (d) (1) of the National List (for use only in organic poultry production until October 1, 2008).

Petaluma Poultry is one of the largest producers of organic poultry in the United States. We have raised anti-biotic free and free range chickens commercially for over 20 years and we have trials with organic chickens dating back to the late 1980's. For over a decade, we have worked with the USDA and NOP administrators in creating rigorous organic standards. Most recently we were part of the NOSB Livestock Committee's Methionine Task Force.

It has been our experience (based on our field trials) that chickens cannot be raised in a humane fashion without being supplemented with Methionine, an essential amino acid. Our field trials without Methionine resulted in poor, unevenly feathered birds that engaged in excessive pecking among each other. We were forced to abandon our trial after a less than full term due to animal welfare concerns. These results were submitted to the NOSB Livestock Committee and are consistent with their independent research on bird performance as well.

Home of Rocky the Range Chicken 

We continue to aggressively pursue non-synthetic alternatives to Methionine. However, at this time, there are no commercially available products that provide the necessary levels of Methionine to raise organic chickens humanely.

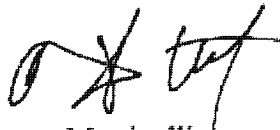
Given that the current authorization for Methionine expires on October 21, 2005, it is essential that this authorization be extended to October 21, 2008. We recognize and acknowledge the NOSB expects that the organic poultry industry will use this three year extension to continue to pursue non synthetic alternatives.

It is important to understand that without Methionine, we will not be able to raise organic chickens. Not only do organic chickens represent a significant product line for Petaluma Poultry, much of our company's legacy is represented by our deep commitment to organic production and our historic position as the holders of the first organic meat label approved by the USDA. If we were not able to continue raising and processing organic poultry, our strong and growing base of consumers would lose an important choice in the marketplace.

Given that

- the NOSB has recommended that the Methionine be added to the National List for use only in organic poultry production until October 1, 2008,
- this recommendation came after extensive review of public comments and industry experiences,
- animal welfare would be jeopardized without the use of this essential amino acid,
- significant unfulfilled consumer demand would result from our inability to raise organic poultry,

our position is strongly supportive that Methionine be added to the National List for use only in organic poultry production until October 1, 2008.



Dave Martinelli
Petaluma Poultry